



Investigation Into Alleged Violations of State Law by IBP, Inc. *Summary Report*

Prepared by

Washington State Department of Agriculture

In cooperation with

Washington State Department of Labor & Industries

Washington State Office of the Attorney General

Washington State Patrol

United States Department of Agriculture - Food Safety and Inspection Service

Walla Walla County Office of the Prosecuting Attorney

April 2001

Publication No. 054

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I. Overview

This report summarizes the conduct and the results of investigations undertaken in response to a petition received by the State of Washington on May 31, 2000 alleging violations of state law at the IBP, Inc. beef processing plant in Wallula, Washington. The report presents information on the petition; the state, federal, and local agencies involved with the investigations; how the investigations were conducted; the results of the investigations; and an agreement reached by the state with IBP, Inc.

The report also provides contacts for more information and a list of documents related to the investigations, including this report, that are available on the Department of Agriculture's web site at www.wa.gov/agr.

II. Petition

On May 31, 2000, the Humane Farming Association (HFA) and eleven other groups presented a "Petition for Enforcement of the Humane Slaughter and Animal Cruelty Laws" to the Washington Attorney General and the Director of Agriculture, with a cover letter to the Governor, asking the state to take certain actions with respect to alleged violations of state law at the IBP, Inc. beef processing plant in Wallula, Washington.

Signatory organizations on the petition included:

- The Humane Farming Association,
- Progressive Animal Welfare Society,
- Humane Society of the United States,
- The Animal Welfare Institute,
- The National Joint Council of Food Inspection Locals AFGE, AFL-CIO,
- The Government Accountability Project,
- Pasado's Safe Haven,
- People for the Ethical Treatment of Animals,
- The Environmental and Energy Campaign of Public Citizen,
- The Physicians' Committee for Responsible Medicine,
- The Northwest Animal Rights Network, and
- The American Society for the Prevention of Cruelty to Animals.

The letter and petition raised complex issues that concern federal, state, and local agencies and a number of state and federal laws. The petition alleged that cattle at the IBP beef processing plant were being slaughtered inhumanely, that meat was being contaminated during processing, and that workers were being injured as a result of the plant's processing practices.

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A number of worker statements and a short videotape were included with the letter. The videotape depicted apparent violations of state and federal humane slaughter laws. Portions edited from that videotape had been broadcast on KING-TV on May 24, 2000.

III. The Investigative Team

Because of the variety and complexity of the allegations, Governor Locke promptly instructed the Department of Agriculture to form an intergovernmental, multi-agency team to review the allegations. The team included representatives of the Department of Agriculture, the Department of Labor & Industries, the Attorney General's Office, and the State Patrol. The United States Department of Agriculture, Food Safety and Inspection Service (USDA-FSIS) and the Walla Walla County Prosecuting Attorney also participated. The team addressed allegations in three areas based on applicable law and jurisdiction.

Briefly, the roles of the various agencies on the team were as follows:

The **Washington State Department of Agriculture (WSDA)** convened the agencies as an ad hoc investigative team and also assisted the State Patrol in the investigation of the allegations of inhumane treatment of animals. These allegations involved Chapter 16.50 RCW, *Humane Slaughter of Livestock*, and Chapter 16.52 RCW, *Prevention of Cruelty to Animals*, both of which carry criminal penalties for violations.

WSDA is authorized to administer the state humane slaughter law. Under RCW 16.50.160, WSDA is authorized to seek an injunction for violation or threatened violation of this law. Violations of Chapter 16.50 RCW are misdemeanors punishable by a \$250 fine or a 90-day jail term (RCW 16.50.170). Unlike with civil infractions where penalties may be levied administratively by an agency, criminal violations are referred to the Prosecuting Attorney to decide whether or not to take action. WSDA has no authority to enforce criminal statutes and thus refers such violations to the county prosecutor for action.

The state animal cruelty law is enforced by "law enforcement agencies and animal care and control agencies" (RCW 16.52.015). These general law enforcement agencies include local police and sheriffs' departments and the Washington State Patrol, but do not include WSDA or the Attorney General.

Because criminal statutes were involved and WSDA has no jurisdiction to investigate crimes, the **Washington State Patrol (WSP)** conducted the investigation into the alleged violations of the humane slaughter and animal cruelty laws. WSP provided an experienced criminal investigator to head up the investigation on-the-ground. Dr. Robert Mead, the state veterinarian, and USDA-FSIS compliance officers provided technical assistance.

Because the IBP plant is located in Walla Walla County, the team asked for and received the assistance of the **Walla Walla County Prosecuting Attorney**. In Washington, it is the county prosecutor who decides whether criminal charges are filed. The Prosecuting Attorney's role was to review the results of the humane slaughter/animal cruelty investigation and determine what charges, if any, should be filed.

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The **U.S. Department of Agriculture's Food Safety and Inspection Service (USDA-FSIS)** is solely responsible for enforcing food safety and sanitation laws in the IBP plant. The IBP facility is one of ten federally inspected livestock slaughter facilities in Washington. By law, USDA inspectors are stationed in the IBP plant when it is operating. These inspectors are present to enforce food safety standards and are also empowered to enforce the federal humane slaughter laws. The federal humane slaughter laws are identical to state law, but do not carry criminal penalties. The federal humane slaughter laws are contained in 7 USC Sections 1901-1906, *Humane Methods of Livestock Slaughter*, and 9 CFR Part 313, *Humane Slaughter of Livestock*.

In 1999, USDA-FSIS had received complaints that were similar to those contained in the petition. It provided the investigative team with a summary of its findings based on those allegations and also reported on recent activities in the plant.

The **Washington Department of Labor and Industries (L&I)** enforces worker safety laws in the plant. L&I enforces the employer's obligation to provide a safe workplace under Chapter 49.17 RCW, *Washington Industrial Safety and Health Act (WISHA)*. Specific right-of-entry is provided under RCW 49.17.070.

The **Attorney General's Office (AGO)** provided legal advice to the state agency members of the team. Although the petition was addressed to the Attorney General, in Washington the Attorney General may investigate or prosecute crimes only under limited circumstances, none of which were present in this instance.

IV. Investigation

Inhumane Treatment of Animals Allegations

(1) Team's plant inspection

On June 7, 2000, team members conducted an unannounced inspection of the slaughter facilities at IBP. The team included State Veterinarian Dr. Robert Mead and another representative from WSDA, two compliance-enforcement officers from USDA-FSIS, two representatives from L&I, and an assistant state Attorney General.

Team members viewed the plant layout and operations, met with company officials, and met privately with the USDA veterinarian in charge of USDA inspection operations at the plant. At the time, Humane Farming Association (HFA) was highly critical of this inspection because the team was directed to the plant manager's office to obtain safety equipment and speak with the company's legal counsel before proceeding to production areas. This process took about 30 or 40 minutes. Because WSDA has no statutory authority to inspect meat packing plants (all meat packing plants in Washington are federally inspected), the delay was unavoidable under the circumstances. Nevertheless, team members accomplished their goals in visiting the plant: they gained valuable, first-hand knowledge of plant operations and construction, reviewed worker safety issues, and demonstrated that the petitioners' allegations were taken seriously by the

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participating agencies. Moreover, if violations of the humane slaughter law had been observed during the visit, WSDA was prepared to take immediate action in court.

After the initial visit, team members independently investigated the issues within their agencies' respective authorities. The team members remained in contact throughout the investigation and cooperated where appropriate.

(2) Team meetings with HFA and attorneys for employees

In June 2000, after HFA declined to meet in person, members of the team met by telephone conference call with HFA representatives and attorneys representing certain IBP employees. HFA and the employees' attorneys indicated their desire to cooperate with the investigation but made clear that they believed individual workers should not be the target of the investigation; in their view, only the company or corporate officials should be held responsible for acts alleged in the petition. HFA and employee attorneys asked that employees be granted immunity from the outset of the investigation and that their identities be kept confidential.

The team explained its need to gather all available relevant evidence and, in particular, the critical need to authenticate the videotape (approximately five minutes long) provided with the petition. Members of the team, including the Prosecuting Attorney, explained it would not be possible at the beginning of the investigation to grant employees immunity from prosecution in exchange for their cooperation with the investigation. An investigation would no longer be objective if some persons involved were treated differently than others before sufficient knowledge had been developed to support that treatment. The team did indicate that, to the extent permitted by state law, it would not disclose the identity of employee witnesses during the investigation.

(3) Conduct of investigation

The investigation proceeded without active assistance from HFA. Because violations of criminal statutes had been alleged, WSP took the lead in conducting the investigation. An experienced, Spanish-speaking detective was assigned as the primary investigator.¹ The state veterinarian, USDA compliance officers, and other Washington State Patrol personnel also participated. The investigators reviewed all of the materials provided with the petition, including affidavits and videotape. They visited the IBP plant, reviewed company records, and interviewed company officials, employees, former employees and others with knowledge of the facts or with relevant expertise.

On September 8, 2000, HFA sent investigators approximately three and a half more hours of videotape, which HFA had apparently had in its possession since before the petition was filed. The investigators reviewed this apparently raw, unedited videotape and compared it with the five minutes of videotape that had been submitted with the petition. They determined that the unedited videotape received on September 8 was the source for the tape submitted by the

¹ Many, if not most, IBP-Pasco employees who handle live animals are native Spanish speakers.

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petitioners in May.² In comparing the same sequence of events on the two videotapes, it was determined that the tape submitted with the petition had been edited to delete actions workers had taken to correct problems they encountered during the stunning process. In four separate instances, the unedited video showed IBP workers stunning an animal within seconds after it was shown to still exhibit signs of sensibility. On the edited version, these second blows with the captive bolt gun had been edited out, leaving the viewer with the impression that a sensible animal was moving along the processing line in disregard of its state. To assist the investigation, WSP compiled a videotape that compares footage shown on the edited videotape with unedited footage of the same events.

Investigators also interviewed witnesses about other acts depicted in the edited and unedited videotapes. Witnesses stated that an animal seen being dragged with a chain had been stunned and was insensible when it was dragged. Witnesses identified an individual responsible for the incident shown on both tapes in which an electric prod was repeatedly pushed into an animal's mouth. The person identified is no longer employed by IBP and has not been located. No witness was able to identify a person or persons responsible for an incident in which the gate between the two knocking boxes was repeatedly lowered onto an animal's neck. Witnesses also stated that a sequence showing problems with stunning operations was because of a malfunctioning captive bolt gun.

Investigators did not discover any evidence that IBP had a written or unwritten policy of either encouraging or permitting employees to mistreat livestock. Persons who had signed affidavits alleging mistreatment of animals, when making statements to the WSP detective, were unable to provide dates, times, or names of individuals involved in particular incidents of animal abuse; nor did such statements indicate that supervisors had sanctioned or encouraged the mistreatment of animals. The investigation did not reveal any benefit to the corporation from systematic or sanctioned abuse of animals. To the contrary, animal experts told investigators that animals that are mistreated or arrive at the stunning area in an excited condition produce lactic acid and depleted glycogen stores in their tissues. This depletion of glycogen stores in the tissues produces so-called "dark cutters" with dark, discolored meat. Dark cutters, according to a recent study, "result from pre-harvest stress, which depletes muscle glycogen stores and thus reduces the glycogen needed to produce the lactic acid that reduces the pH of postmortem muscle."³ An animal in this condition produces meat of such undesirable quality that its value is significantly reduced.

(4) Report forwarded to prosecutor

WSP forwarded its investigation report to the Walla Walla County Prosecuting Attorney on February 1, 2001. The package included a narrative report, the relevant videotapes, and other

² The tape submitted with the petition is essentially identical to videotape first broadcast on KING-TV on May 24, 2000.

³ J.A. Scanga, K.E. Belk, J.D. Tatum, T. Grandin, and G.C. Smith. "Factors Contributing to the Instance of Dark Cutting Beef,"

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supporting documentation. As is its practice, WSP did not make any recommendations as to whether charges should or should not be filed based on the report.

Food Safety Allegations

Investigation of the allegations of food safety violations was carried out by USDA-FSIS under its authority. Unlike WSDA and L&I, USDA has an ongoing presence at IBP. Because it is a federally inspected plant, the IBP plant has a team of USDA inspectors in the plant during all hours of operation. Approximately 10 USDA inspectors, headed by a veterinarian-in-charge, are assigned to the plant. The USDA officials inspect meat for contamination and are also authorized to enforce the federal humane slaughter laws, although that is not their primary function. Nonetheless, USDA staff observes the handling of livestock at the knocking box area on an hourly basis.

USDA-FSIS accompanied the investigative team on the June 7 inspection and provided technical assistance throughout the investigation on the animal cruelty / humane slaughter law allegations. Essentially the same allegations of food safety violations contained in the petition had been previously presented to and investigated by USDA-FSIS in 1999. Mr. James Grems, Assistant District Manager for Enforcement, provided the task force with a description of those investigations on June 28, 2000.

According to the report, USDA-FSIS' Compliance and Investigative Division conducted investigative interviews with employees about allegations of food safety violations from June 28 through July 1, 1999 based on a letter from Ms. Maria Martinez, Teamster Local 556 Chief Shop Steward and IBP employee. USDA "found no evidence to support the allegations." Information generated through the interviews was used by inspection personnel to target monitoring of production operations.

The report did note one "Noncompliance Record" report by Dr. J. C. Kile, the veterinarian-in-charge, involving excessive use of the electric cattle prod by an IBP employee in December 1999, in violation of the humane slaughter law. The incident was reported to IBP management by Dr. Kile and corrective action was taken against the employee.

Basic safety and sanitation requirements for meat packing plants are contained in the federal Hazard Analysis Critical Control Point (HACCP) rules and the Sanitation Standard Operating Procedures (SSOP). Throughout the two-year period (1999-2000), although some deficiencies were reported, Mr. Grems' report noted that IBP "had demonstrated effective implementation of corrective actions that preclude recurring HACCP and SSOP system plan failures."

Leonard Ramsey, who replaced James Grems as Assistant District Manager for Enforcement, USDA-FSIS, provided an update in April 2001. Mr. Ramsey reported that in the period from June 2000 to April 2001, "no major incidents have occurred. No Sanitation Standard Operating Procedures (SSOP) or Hazard Analysis and Critical Control Point (HACCP) failures have occurred that has required the documentation of a case file." He did, however, note one reported instance of inhumane treatment of animals on July 25, 2000.

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That incident involved the inhumane handling of livestock being driven into a cattle holding pen. The cattle stopped moving and some animals were unable to move into the pen, thus not allowing the gate to be closed on the pen. The inspector who documented the incident observed that two animals were being excessively prodded (electric prod) by a company employee to get them to move into the pen. The inspector observed that both animals were visibly distressed as evidenced by the animals repeated bellowing after being prodded and trying to move forward to get away from the prod.

The inspector initiated control measures by informing the employee to stop poking the animals and informed management of the deviation. No other incidents of inhumane handling were observed or reported by USDA-FSIS inspection staff.

Worker Safety Allegations

The investigation into allegations of violations of worker safety laws at IBP was conducted by the Department of Labor and Industries in two phases. The first phase was a part of the joint inspection on June 7. Two L&I inspectors accompanied the team. At that time, based on that inspection, the two inspectors:

- Could not document violations of WISHA based on the allegation that workers must attempt to “stick,” skin or dismember live, struggling animals, and
- Could not document violations of WISHA based on the allegation that workers must stun animals that are in a “panicked state” and therefore represent a hazard to workers.

In assessing the potential for WISHA violations, L&I must be able to prove an event occurred in order to consider it a violation. In those areas where there are no applicable worker safety standards, they must demonstrate that the employer has failed to meet the “general duty” or “safe place” test or some other “general obligation” standard. L&I inspectors believed that the activities observed during their visit did not constitute violations.

This visit, however, was not the only WISHA activity in relation to this IBP site. Over the past several years, L&I Region 5 staff had investigated a number of complaints and conducted a number of inspections at IBP, including complaints related to ergonomic hazards (line speed), respiratory protection, slippery floors, and the availability of sanitary facilities. In some cases, they were able to document violations, citations were issued and penalties were assessed.

On February 15, 2001, L&I staff opened a coordinated, joint inspection of IBP. The inspections (hygiene and safety) were targeted inspections and included a comprehensive review of the facility and its operations. The inspection team included two industrial hygienists, who spent four days on-site, and two safety and health specialists, who spent three days on-site. In addition, a safety and health compliance supervisor reviewed all the written programs for adequacy and compliance with applicable WISHA requirements.

Of the four enforcement staff who spent time at the site, three are bilingual and are able to interview Spanish speakers in their first language. The inspectors interviewed more than 40 employees throughout the plant’s operations, including employees involved in the “kill lines.”

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At the time of the inspection, no violations were identified related directly to the kill line. Although there were some indications (in employee interviews) that the line had been slowed, the inspectors do not believe that violations would have been identified even had the line been operating at a higher speed. While there are safety and health problems on the line (confirmed by injury records), it appears that many of them relate to ergonomic issues that are not readily addressed under current standards.

V. Results of the Investigations

Animal Cruelty / Inhumane Slaughter Allegations – Prosecutor’s Decision

Given the high profile nature of this matter, Walla Walla County Prosecuting Attorney Jim Nagle asked four other prosecutors to give opinions on the viability of prosecution based on WSP’s report and the supporting materials. The crimes considered by the Prosecuting Attorney were animal cruelty in the first degree (RCW 16.52.205) and violation of the humane slaughter law (RCW 16.50.110, .120 and .170). The Prosecuting Attorney also considered the standards that must be met to prove a corporation is liable for a crime (RCW 9A.08.030). Having considered the contents of the investigative report and the applicable law, the Prosecuting Attorney concluded there was not sufficient admissible evidence to prove criminal corporate liability beyond a reasonable doubt and in light of defenses that might be raised. In reaching this decision, he indicated that the WSP report and accompanying videotapes were more than adequate to describe the alleged activity and provide possible defenses.

The Prosecuting Attorney determined there was no evidence showing that the alleged offenses were solicited or tolerated by IBP. In fact, company policy is to the contrary. He found that the acts in question were not done by employees in the course of employment. Further, unedited videotape showed that employees took corrective action if an animal had not been properly stunned. The Prosecuting Attorney could not conclude that the alleged activity would benefit the company or that there was any evidence of intent to benefit by the activity, or of intent to do harm. Neither was there any basis for imputing the alleged acts to the company.

The Prosecuting Attorney was particularly concerned that the unedited videotape demonstrated HFA’s intent to promote a particular agenda through the edited tape, such that all evidence developed by HFA was discredited. Other credibility issues include the possibility of witness bias based on a history of labor unrest at the plant.

While he declined prosecution, the Prosecuting Attorney hoped that IBP would work to achieve compliance with applicable regulations. He expressed his reservations about the adequacy of IBP’s training programs and its need to develop a cooperative management style. He also noted that the company has been put on notice, so that future violations might be easier to prosecute.

USDA-FSIS Inspection Results

USDA-FSIS did not note any significant violations of food safety laws during the period of the investigation and no civil enforcement actions were undertaken by USDA-FSIS staff during this period. No major incidents have occurred. No SSOP or HACCP failures have occurred that

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have required the documentation of a case file. During this time, USDA-FSIS staff did note one instance of inhumane treatment that was addressed with IBP management. Although it is not their primary function, USDA-FSIS staff is observing the handling of livestock at the knocking box area on an hourly basis.

Labor and Industries Worker Safety Review Results

L&I's February 2001 review did not document any serious violations involving the stunning area. However, there were other violations noted and penalties assessed. The L&I industrial hygienists documented two serious hygiene violations related to the use of a chemical disinfectant/cleaner without eye or hand protection. The total penalty for these violations is \$560. The safety inspection also resulted in a guarding violation on a band saw using for cutting ribs, a guarding violation for a conveyor in the hamburger room, and two violations related to the vertical lifeline in the upper engine room. The total penalty for all four serious safety violations is \$8,400, making a total penalty for both inspections of just under \$9,000. The review of all the required written programs identified no violations.

L&I concluded that, "While the findings are significant, particularly in relation to the exposed employees, they are not extraordinary in an operation this size." In addition to the current actions, L&I has an on-going responsibility to investigate worker complaints and conduct WISHA compliance inspections.

VI. WSDA – IBP Agreement

As a result of negotiations that were conducted after the WSP investigative report was forwarded to the Prosecuting Attorney, WSDA and IBP have signed a written agreement that allows WSDA to monitor animal slaughter conditions and practices at IBP. This agreement will run at least through September 2002. Without this agreement, IBP is not obligated to allow WSDA access to its plant or to carry out any improvements to its practices or premises.

(1) Background

WSDA's ability to administer Chapter 16.50 RCW, *Humane Slaughter of Livestock*, is limited to seeking an injunction to stop actual or threatened violations of law. Even so, WSDA regarded the allegations contained in the May 31, 2000 petition as very serious. WSDA, therefore, looked for a way to ensure compliance with law and to achieve improvements in practices and conditions at the IBP plant. In doing so, WSDA was careful not to interfere in the Prosecuting Attorney's decision on whether or not to file criminal charges based on WSP's investigation.

After the investigative report was sent to the Prosecuting Attorney, WSDA asked IBP to discuss possible improvements to practices and conditions in the plant. IBP indicated that it had already taken some measures in light of the allegations made and would like to discuss those measures and other potential areas of agreement. As a result of these discussions, WSDA and IBP executed a written agreement on April 10, 2001.

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(2) What the agreement does

As a result of this agreement, IBP will:

- allow WSDA to conduct unannounced inspections of its premises. WSDA representatives need only identify themselves before proceeding directly to their first destination inside the plant;
- continue existing training programs for employees and supervisors responsible for handling live animals and cooperate with WSDA to ensure that the programs address stunning, handling live animals, signs of sensibility in animals, and legal requirements for handling live animals;
- continue current hands-on training for stunners to ensure that only experienced, well-trained employees carry out stunning operations;
- implement a training program for employees down the line from stunning and sticking operations to educate these employees on signs of sensibility in animals;
- maintain records of training content, schedules, and attendance for at least one year;
- establish in writing current protocols and practices for daily supervision of employees responsible for handling live animals and for maintenance, use and repair of captive bolt guns, subject to WSDA concurrence;
- maintain current protocols on driving animals to stunning areas, use of electric prod, and instances in which an animal is discovered beyond the stunning or sticking area without having been rendered fully unconscious;
- maintain and enhance its current video monitoring program by operating three video cameras and taping their output according to an agreed random audit protocol;
- provide WSDA with plans and specifications for future modifications to the stunning area, if any; and
- allow WSDA to inspect IBP records and videotapes relevant to the agreement.

The agreement between WSDA and IBP will be in effect until September 30, 2002 unless it is terminated because one of the parties has not met its obligations. After that date, the agreement may continue as long as both IBP and WSDA want it to.

(3) Other terms of the agreement

On September 30, 2002, unless the agreement is ended because one of the parties did not meet its obligations, WSDA will release IBP and its employees from any enforcement action WSDA might have instituted up until that time. If the agreement continues, WSDA will give a similar

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release when the agreement ends. However, if IBP does not meet its obligations under the agreement, WSDA will not give any such release.

If WSDA receives a public disclosure request relating to the agreement, IBP is entitled to notice. This notice is permitted by RCW 42.17.330. Once notice is given, IBP can decide whether to ask a court to prevent disclosure of records in which it has an interest. WSDA will follow the law and/or the court's order in releasing such records.

VII. Conclusion

The allegations brought forward by the Humane Farming Association and the other petitioners were very serious. They were carefully investigated by the state and federal agencies with legal responsibility. The criminal investigation on the allegations of violation of the humane slaughter law and animal cruelty law was carried out by the Washington State Patrol. Based on the information developed, the Prosecuting Attorney determined that criminal prosecution was not warranted. L&I determined there were violations of worker safety laws in the plant in its February 2001 review but these were not related to the allegations in the petition. Appropriate penalties were assessed. USDA-FSIS found no significant violations of the food safety laws at the plant over the past year. No administrative actions have been taken for food safety violations.

WSDA's goal throughout the investigation has been not only to provide pertinent and accurate information to the Prosecuting Attorney but also to determine if there were other steps that could be taken that would improve conditions for handling of animals on-the-ground in the IBP plant. After the investigative report was handed over to the Prosecuting Attorney, WSDA pursued that effort with IBP. The agreement with IBP was developed as a result.

From the outset, all agencies concerned have worked toward a resolution that will effectively address the public's legitimate concerns about the humane treatment of animals during slaughter. The agreement between WSDA and IBP was designed to serve that purpose whether criminal charges were filed or not. With this agreement, state officials will be able to monitor conditions and practices in the plant until at least September 30, 2002. WSDA believes the agreement will greatly assist in preventing the inhumane treatment of animals.

VIII. For more information

This report, documents referred to in this report, and other related documents are available on the WSDA website at www.wa.gov/agr. The following documents are among those included.

- Petition for Enforcement of the Humane Slaughter and Animal Cruelty Laws, May 31, 2000
- Letter from Governor Locke to Director Jesernig, June 2, 2000
- Worker Safety Investigation Report, Dept. of Labor & Industries, March 26, 2001
- Food Safety Investigation Report, USDA-FSIS, June 28, 2000
- Description of the comparison videotape prepared by the Washington State Patrol
- Walla Walla County Prosecutor's Decision Letter, April 18, 2001

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- Agreement between IBP, Inc. and the Washington State Department of Agriculture, April 10, 2001
- State Laws and Rules
 - Chapter 16.50 RCW, Humane Slaughter of Livestock
 - Chapter 16-24 WAC, Humane Slaughter of Livestock
 - Chapter 16.52 RCW, Prevention of Cruelty to Animals
- Federal Laws and Regulations
 - 7 USC Sections 1901-1906 Humane Methods of Livestock Slaughter
 - 9 CFR Part 313 Humane Slaughter of Livestock
 - 21 USC Sections 602-606, Meat Inspection

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